D.3.2

Roy F. Weston, Inc.
1 Weston Way
West Chester, Pennsylvania 19380-1499
610-701-3000 • Fax 610-701-3186

Sally Averill
United States Environmental Protection Agency
Region V
HRE-8J
77 West Jackson Blvd.
Chicago, IL 60604-3590

10 June 1994

RE: Draft Report on the Interim Remedial Measures
EKCO Housewares Facility, Massillon, Ohio

Dear Sally,

Enclosed for your review are three (3) copies of the Draft Interim Remedial Measures Report for the EKCO Housewares facility in Massillon, Ohio, prepared for American Home Products Corporation.

In addition to the hydrogeologic data included in the scope of the report, we are forwarding for your information some preliminary analytical results from the quarterly sampling conducted at the site in April/May 1994 (post-well rehabilitation). The analytical data is attached as Table A and indicates an order of magnitude drop in total VOC levels in bedrock wells R-1 and R-2 since their rehab. At this time, we are continuing to evaluate this data.

Please contact either myself at (610) 701-7273 or Patricia McDonald (AHP) at (201) 660-5590 with any questions.

Very truly yours,

ROY F. WESTON, INC.

Paul G. Landry, P.G.
Senior Project Geologist
Geosciences Department

ekco\irm
Enclosures

D.S.6
OHD 045265424

Metcalf & Eddy
An Air & Water Technologies Company

March 31, 1994

Ms. Sally Averill
United States Environmental Protection Agency
RCRA Enforcement Section
230 South Dearborn Street
Chicago, IL 60604

RE: EKCO Housewares Site, Work Assignment No. R05031
Interim Remedial Measures Field Notes for 3/22/94 through 3/29/94

Dear Ms. Averill:

Enclosed is one copy of the field notes for the Interim Remedial Measures oversight at the EKCO Housewares Plant in Massillon, Ohio, for the eight-day period of March 24, 1994 through March 29, 1994.

Personnel on-site during this period consisted of Barry Nelson, Jeff Stevenson, Steve Hulett, and Greg Tedrow of Metcalf & Eddy, Paul Landry of Weston, Doug Frontz and John O'Brien of Frontz Drilling.

Activities during this period consisted of retrofitting the R-wells (R-1, R-2, and R-3) with 2-inch stainless-steel monitoring wells installed inside the existing wells, installing and grouting of 8-inch diameter PVC liners within the existing steel casings in the W-wells (W-1, W-2, and W-10), abandoning well D-4-30, and conducting Caliper Logs, Natural Gamma Log, and Resistivity Log on wells W-1, W-10, W-2, and R-3.

The only deviation from the Draft final Interim Remedial Measures Work Plan occurred concerning the retrofitting of the R-wells. The Work Plan stated that a cement/bentonite plug would be installed in the bottom of the wells, to the top of the shale and argillaceous sandstone layer. This procedure would have led to grout contamination within the wells. It was decided and approved by yourself that a coarse gravel layer should be installed instead of the grout plug. This was communicated to Steve Hulett, Metcalf & Eddy, in a phone call on March 23, 1994.

2800 Corporate Exchange Drive, Suite 250, Columbus, OH 43231
614-890-5501 FAX 614-890-7421

The field procedures employed by the PRP consultant, as observed by Metcalf & Eddy, Inc., were consistent with EPA-approved plans and protocols. If you have any questions or comments, please call me at (614) 890-5501.

Sincerely,

METCALF & EDDY, INC.

Beth A Wolf

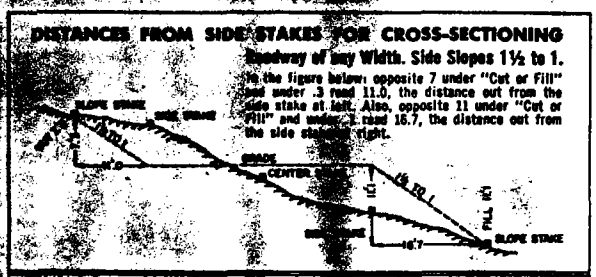
Beth Wolf
Project Manager

BW/djg

cc: T. Lentzen
File

DISTANCES FROM SIDE STAKES FOR CROSS-SECTIONING

Roadway of any Width. Side Slopes 1½ to 1.



In the figure below: opposite 7 under "Cut or Fill" and under .3 read 11.0, the distance out from the side stake at left. Also, opposite 11 under "Cut or Fill" and under .1 read 16.7, the distance out from the side stake at right.

Cut or Fill	0	.1	.2	.3	.4	.5	.6	.7	.8	.9	Cut or Fill
	Distance out from Side or Shoulder Stake										
0	0.0	0.2	0.3	0.5	0.6	0.8	0.9	1.1	1.2	1.4	0
1	1.5	1.7	1.8	2.0	2.1	2.3	2.4	2.6	2.7	2.9	1
2	3.0	3.2	3.3	3.5	3.6	3.8	3.9	4.1	4.2	4.4	2
3	4.5	4.7	4.8	5.0	5.1	5.3	5.4	5.6	5.7	5.9	3
4	6.0	6.2	6.3	6.5	6.6	6.8	6.9	7.1	7.2	7.4	4
5	7.5	7.7	7.8	8.0	8.1	8.3	8.4	8.6	8.7	8.9	5
6	9.0	9.2	9.3	9.5	9.6	9.8	9.9	10.1	10.2	10.4	6
7	10.5	10.7	10.8	11.0	11.1	11.3	11.4	11.6	11.7	11.9	7
8	12.0	12.2	12.3	12.5	12.6	12.8	12.9	13.1	13.2	13.4	8
9	13.5	13.7	13.8	14.0	14.1	14.3	14.4	14.6	14.7	14.9	9
10	15.0	15.2	15.3	15.5	15.6	15.8	15.9	16.1	16.2	16.4	10
11	16.5	16.7	16.8	17.0	17.1	17.3	17.4	17.6	17.7	17.9	11
12	18.0	18.2	18.3	18.5	18.6	18.8	18.9	19.1	19.2	19.4	12
13	19.5	19.7	19.8	20.0	20.1	20.3	20.4	20.6	20.7	20.9	13
14	21.0	21.2	21.3	21.5	21.6	21.8	21.9	22.1	22.2	22.4	14
15	22.5	22.7	22.8	23.0	23.1	23.3	23.4	23.6	23.7	23.9	15
16	24.0	24.2	24.3	24.5	24.6	24.8	24.9	25.1	25.2	25.4	16
17	25.5	25.7	25.8	26.0	26.1	26.3	26.4	26.6	26.7	26.9	17
18	27.0	27.2	27.3	27.5	27.6	27.8	27.9	28.1	28.2	28.4	18
19	28.5	28.7	28.8	29.0	29.1	29.3	29.4	29.6	29.7	29.9	19
20	30.0	30.2	30.3	30.5	30.6	30.8	30.9	31.1	31.2	31.4	20
21	31.5	31.7	31.8	32.0	32.1	32.3	32.4	32.6	32.7	32.9	21
22	33.0	33.2	33.3	33.5	33.6	33.8	33.9	34.1	34.2	34.4	22
23	34.5	34.7	34.8	35.0	35.1	35.3	35.4	35.6	35.7	35.9	23
24	36.0	36.2	36.3	36.5	36.6	36.8	36.9	37.1	37.2	37.4	24
25	37.5	37.7	37.8	38.0	38.1	38.3	38.4	38.6	38.7	38.9	25
26	39.0	39.2	39.3	39.5	39.6	39.8	39.9	40.1	40.2	40.4	26
27	40.5	40.7	40.8	41.0	41.1	41.3	41.4	41.6	41.7	41.9	27
28	42.0	42.2	42.3	42.5	42.6	42.8	42.9	43.1	43.2	43.4	28
29	43.5	43.7	43.8	44.0	44.1	44.3	44.4	44.6	44.7	44.9	29
30	45.0	45.2	45.3	45.5	45.6	45.8	45.9	46.1	46.2	46.4	30
31	46.5	46.7	46.8	47.0	47.1	47.3	47.4	47.6	47.7	47.9	31
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33	49.5	49.7	49.8	50.0	50.1	50.3	50.4	50.6	50.7	50.9	33
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35	52.5	52.7	52.8	53.0	53.1	53.3	53.4	53.6	53.7	53.9	35
36	54.0	54.2	54.3	54.5	54.6	54.8	54.9	55.1	55.2	55.4	36
37	55.5	55.7	55.8	56.0	56.1	56.3	56.4	56.6	56.7	56.9	37
38	57.0	57.2	57.3	57.5	57.6	57.8	57.9	58.1	58.2	58.4	38
39	58.5	58.7	58.8	59.0	59.1	59.3	59.4	59.6	59.7	59.9	39
40	60.0	60.2	60.3	60.5	60.6	60.8	60.9	61.1	61.2	61.4	40

SALLY AVERILL : (312) 886-4439
(USEPA)

Barry R. Nelson
Project Hydrogeologist

M&E
Metcalf & Eddy
An Air & Water Technologies Company

Metcalf & Eddy, Inc.
2800 Corporate Exchange Drive, Suite 250
Columbus, Ohio 43231
(614) 890-5501 FAX (614) 890-7421

The paper in this book is made of 50% high grade rag stock with a WATER RESISTING surface sizing.

TUESDAY MARCH 22, 1994

Weather: Sunny, scattered clouds, slight breeze, high to reach 60°F, Currently 35° F.

0805 BN onsite to perform oversight for USEPA at EXCO Housewares in Massillon, Oh.

PERSONNEL ONSITE:

Barry Nelson	M:E
Paul Landry	Weston
Doug Frontz	Frontz Drilling
John O'Brien	↓
Jason	

0830 Talked to Paul about yesterday's activities. W-1 is about down while W-10 continues to pump. The pump and sleeve has been pulled from W-1 and they are planning to install new lining today. He noted that the lining is 8" diameter as is the pump sleeve so they need to track down a new 7" sleeve by tomorrow when the pump gets put back in. Drumhiller geophysics done on W-1, W-2 & R-3 yesterday too. He spent about 10 minutes giving BN an overview of work for the week.

0900 Waiting for decon/water truck to arrive onsite. Other FRONTZ crew is building a decon pad just inside fence around the back.

1010 Paul is doing paperwork, FRONTZ personnel are un-packaging 6-inch PVC on decon pad and presumably setting up to decon if later - No H20 truck yet.

1125 Weston is going around front to W-1 to start w/ liner. FRONTZ rig and support truck just arrived at decon area.

1143 Back to decon area. They can't do anything more until liner / PVC sleeve is decon'd. FRONTEX removed wiring and busted other PVC sleeve off the pump.

1235 Back @ decon area. Weston has decon'd the large diameter PVC and has it on plastic on decon'd trailer. They are now setting up tronic pipe for decon.

1260 LUNCH - Paul said they'll start up again at about 1330.

1426 Well D-2 overdrilled w/ 4¼" HSA to 20' depth. Hole is open to bottom. Will grout thru HSA to surface. - then pull and decon HSA.

1504 Grouted D-2 to surface with Portland / Gel mix. Paul stopped by and told him that W-1 was ready to grout. The liner is in place with a 2-foot bentonite seal. ½ ft. sand is on top to allow Weston to tag where grouting should begin.
- Weston is moving to W-2.

1532 Begin steamcleaning ATV CME 75 tools, PVC, grout barrel, etc. Using H_2O brought onsite by FRONTZ

1552 End decon - filling up ATV H_2O tank off flatbed support truck.

1558 BN @ W-2. Frontz just put cover down on overwork truck. Pump and casing are laying on ground between well house and EKCO building; liner in W-2.

1605 Paul went to call office for further instructions concerning W-2.

1615 Jason is steamcleaning HSA and Rods from D-2. (slow)

1645 CME 55 ATV is loaded for grouting W-1. Doug said to wait until tomorrow am. They have 13 bags to mix @ 3 per 55 gal drum so it wouldn't get done tonight.

Also, W-2 has liner, bentonite set and is ready to grout. after W-1 tomorrow.

1655 John O. and Jason are setting up at W-1 in front.

- Planned Activities for Wed (3/23):
  - grout W-1 and W-2 tomorrow morning using ATV rig. (liners)
  - if time left, install screen and riser in R-1, R-2, and R-3 (converting to 2-inch wells)

1715 B. Nelson offsite.

Barry Nelson
3-22-94

3/23/93 Wed.

0730 Arrive onsite Weston + Fronty not arrived yet.

Weather: Clear sunny Temp. 49°F, Forcast 65°F

0815 Fronty Drilg arrive onsite

0820 Weston arrive onsite.

Personnel

Steve Hulett - M&E
Paul Landry - Weston
John OBryan - Fronty
Jason - "

0821 Discussed days activities with Paul. Fronty will grout the liners into well W1 at 49 ft. They will then grout W2 liners. using the ATV rig a a 2" PVC tremi pipe.

0910 Fronty rig grouting at 49 Bentonite through the Mix pump in a 55 gal drum. Paul says that the grout mix is to thick & can't pump.

he is going to talk to Fronty about getting a grout Mixer due to the high volume needs Mixed.

0920 Fronty tried to pump the mix and couldn't. They are going to call Ford Doug Fronty to see about getting a grout Mixer.

0940 Weston called Fronty and Fronty can't get a Mixer.

They will try Mix with the #2 Rig, but will mix the portland first. They will mix the bentonite last this won't allow the bentonite to swell until it gets down hole which is what is desired. Fronty is cleaning out the grout drum.

1000 Fronty returns & prepares to mix grout.

1025 Grout mixed & tremied down the hole. Mix Bentonite last worked very well.

1100 The grout appears to be going out into the formation at about 18 ft B.G. Weston will let the grout set overnight and top off in the A.M.

11:05 Frontz demob off site.

11:25 Demob & head to W-2

1135 Arrive at ~~#~~ W-2 & start to Mobilize.

Paul says he is going to grout in stages in order to minimize loss of grout into the formation through the leaky casing

1300 Frontz. grouts W-2

1330 Trim pipe is stuck in the well annulus.

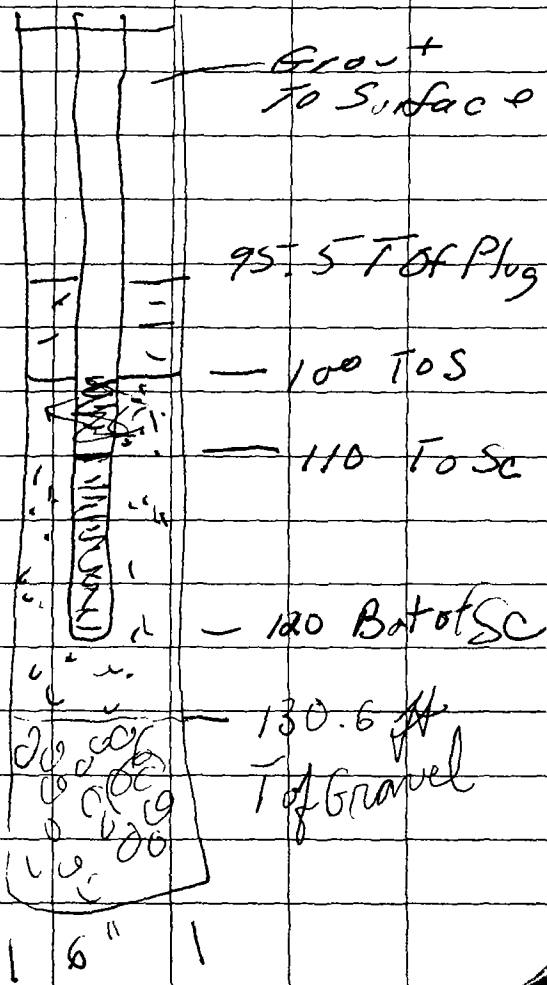
1345 Weston has decided to continue and grout this well and then try to pull out the Temi with the wire line. If the Temi breaks off, they will just grout it in.

1425 Frontz used wire line to pull the Temi, so will denob & move on.

1445 Frontz is clearing out the grout tube & will decon some screen & riser to construct a 2" well inside one of the R wells. Paul is setting up a staff gauge at the lagoon excavation.

1500 The R wells will be screened from ≈ 115 to 125 ft B.G. as stated; the work plan with 10 ft screens

1530 Called Sally Averill - USEPA about put sand instead of grout in the bottom of R-1 in order not to cause grout contamination. Sally said that was a good idea and OK'd it.



1745 Installed plug & will grout in the A.M.

1800 M&E off site.

End of Day.

Constructed well - R-1
Will complete grout R-1, W-2, & W-1

0800 M&E arrives onsite Weston & Fronty have not arrived.

Weather: Cloudy Mid 40's °F.

0805 M&E leaves site for coffee

0825 M&E, Weston, & Fronty are onsite will complete grouty R-1

28

0900 Setting up at R-1, Frontz has picked up water & cement are preparing to grout.

0950 R-1 is grouted to the surface. Frontz pulls trailer & prepares to clean eq. & Brock and move to next hole

1015 Arrive at W-1 to continue to grout.

29

1105 W-1 grouted to the surface for 24 ft.

1115 Frontz cleaned up & prepare to move to W-2

11:30 Frontz mobs at W-2 & will continue

1220 Frontz preparing to grout hole

1305 Rong Frontz shows up to reinstall the pump in W-1

1315 W-1 grouted. Frontz will demob & Clean up

1320 Will go construct a well in R-3

1350 Frontz steam cleaning well material and picking up water.

1430 Frontz still install well in W-1

1500 Still installing W-1 and setting up on Well R-3

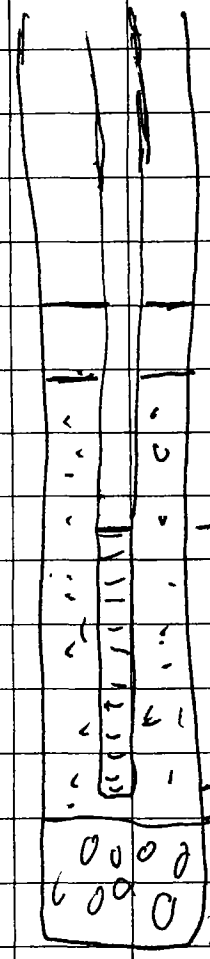
1525 Frontz still installing pump in W-1

1604 Frontz has pump installed in W-1 at ≈ 158'.

1610 R-3 has had coarse sand install to 126.2 ft.

1700 Sand at 97.5
Screen 119-109

R3



1715 R3 installed, will wait till A/M to install grout.

1730 M&E off site.

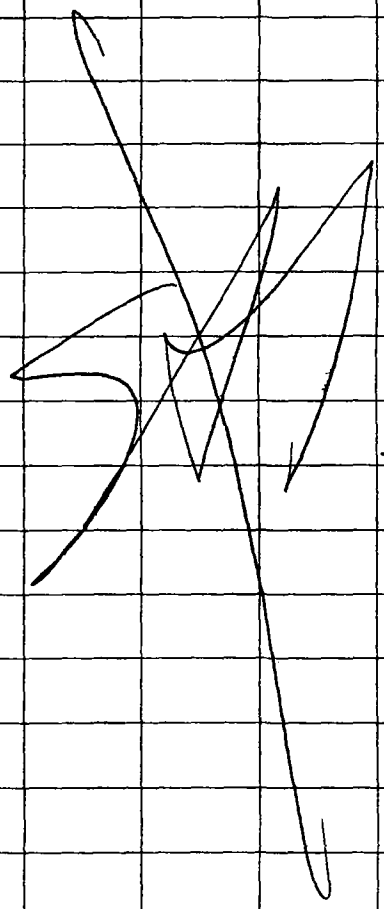
End of Day

Complete grout of R-1, W-1, and W-2. Production pump has been reinstalled in well W-1. Well has been constructed in well R-3. R-3 will be grouted in the A/M and another R-Well will be Constructed.

3/05/94

0830 M&E arrives onsite
Weston onsite

0835 Fronty arrives onsite



Personnel Onsite
S. Hulett - M&E
P. Landry - Weston
J. Obrzut - Fronty
Mike - "

Weather: Mid 30's to 40°F
Cloudy, Windy

Fronty will grout R-3
to the surface and then

Construct another R-Well

0915 Frontz mixing grout for ~~3~~ R-3

0940 Frontz pumping grout into R-3. Paul says he will be here at 8:AM on Monday. They will pull W-10 and run an E-log on it. They will then set a casing & grout it. He believes they will be done by Wed.

1040 R-3 grout complete but not to surface. Weston will wait till Monday and top the grout & top it off. Frontz has been cleaned and is preparing to go set the next R-well.

1100 Weston setting well at R-2.

TD 153

Screen 118.5

108.5

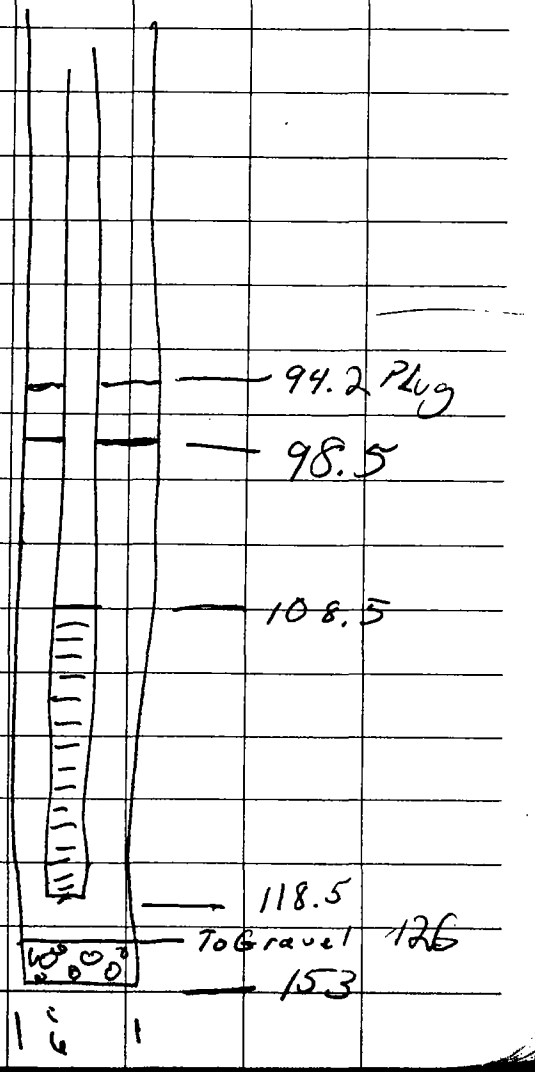
125 Coarse gravel

1120 Screen + Riser set at R-2

1245 R-2 set, will grout on Monday

1300 M & E off site

End of Day
Completed grout R-3 and installed R-2.



3-28-94

On-Site 13:40.

- Jeff Stevenson - M&E Geologist met Paul Landry at Weston Trailer.

- Currently running Geo Phys. on W-10 misaid plant.

- Running Caliper, Gamma + resistivity +

Looked at Caliper log + Gamma log.

14:20 - Begin Resistivity Log.

Jeff St 3/28/94

- Unfiltered & log shows sandstone + Shale. Top part of log somewhat unclear where Casing starts + Sandstone begins.

14:30 Resistivity complete.

14:35 Begin Running high density log.

Logger suspect casing at 44'-

14:40 Logging complete w. Hi high density.

Jeff St 3/28/94

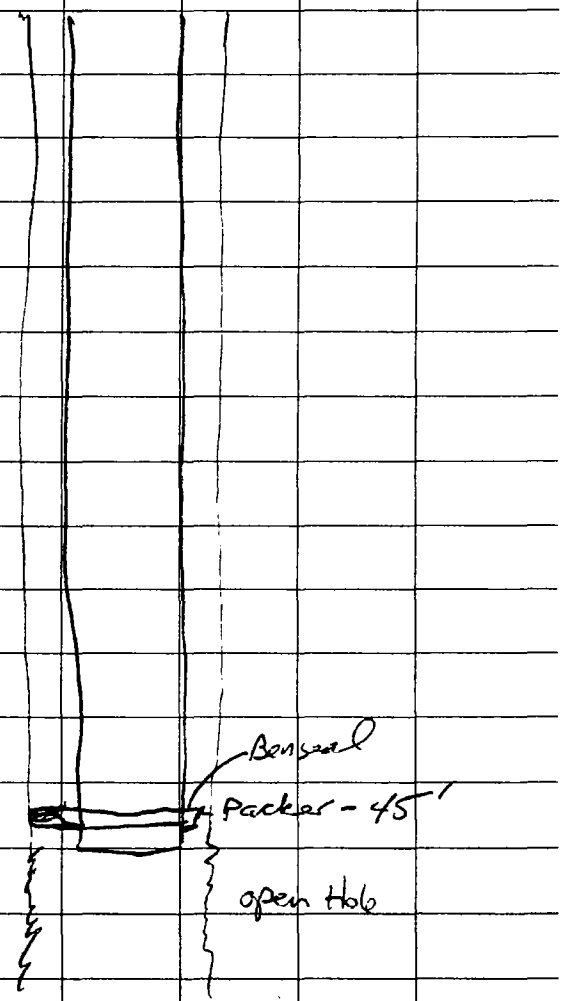
Driller from Frontz Tryon to verify casing depth. with Magnet.

Assume Casing at 44' will set 45' of PVC in the hole.

14:45 Frontz personnel decon Steel Pipe + cutting PVC.

16:20 Placed packer on 8" PVC and began to set it into to well W-10.

3/28/94



17:30 Last piece of PVC liner in the well casing

NOTE: 3/4" Black tremmie won't fit between liner and casing. Drillers will use 1/2" PVC as Tremmie will have to use PVC Cement for PVC. Paul Landry (Weston) gave permission to use this method to tremmie. Tremmie is outside of liner Should be minimal Contact between tremmie line and water.

Jeff St 3/28/94

Oatey Brand Cement - has Acetone, MEK, Cyclohexane tetrahydrofuran and PVC resin.

17:45 Tremmie line is in the borehole.

NOTE: Could not call Salley at EPA because after 5:00

Did not use sand on top of packer - hole very tight. Paul Landry is not concerned about grout getting past the packer.

Jeff St 3/28/94

18:00 getting ready to mix grout. needed water.

19:10 mixing Grout
4 bags 12 lbs Bentonite
30 gallons H_2O

19:15 grout Complete.
Can to Surface.

19:30 Dropped pump into W-2.

19:40 off site

Jeff 3/28/94

3/29/94 (Greg Tedrow)

0900 Leave office for EKCO

1130 Arrive at site
Meet P. Landry
He was developing R-1 from top of water (clear)

1150 Paul stops developing and pulls Keck pump (clear)
Guys from Frontz Drilling putting in pump into production well

1200 Frontz to lunch (1 guy)
Paul cleaning equip (pump, w. level, etc.)

1223 Frontz guy back
Paul eating lunch
Weather: cloudy, 40's breezy

1300 Setting up on R-2

1327 Start developing R-2 (clear)
Paul said pump pulls 1 1/2 gpm
Not taking parameters (temp, pH, cond.)

1400 Stop developing R-2
Pull pump
Pulled from top of water column

1410 Pack up equip + move

1415 Empty bulk tank of dev. water into stripper inside plant

1520 Had to empty bulk tank into 2 55 gal drums (90-100 gal) This was done bcs the truck could not get to the stripper. A tow motor will haul the water on a pallet to the stripper

Paul said that EKCO employees will dump those 2 drums of water into the stripper. He said that EKCO dumps the purge water also after quarterly sampling

1545 Frantz is done installing the pump into W-10

Frantz is now welding on hinged caps onto R-1, R-2 + R-3

1548 Paul is setting up on R-3

1602 Start developing R-3
Pumping water into 55 gal drum
EKCO employees will dump this drum into stripper also (55 gal)

1642 Done developing R-3
Frantz was also putting weep holes on the wells along w/ lids

1655 Packing up equip

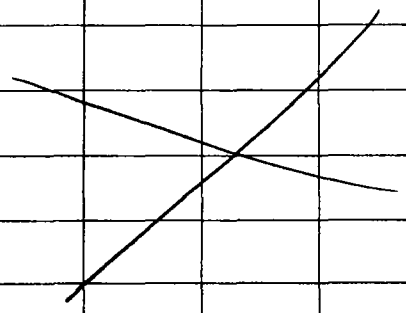
1710 Move on to W-2

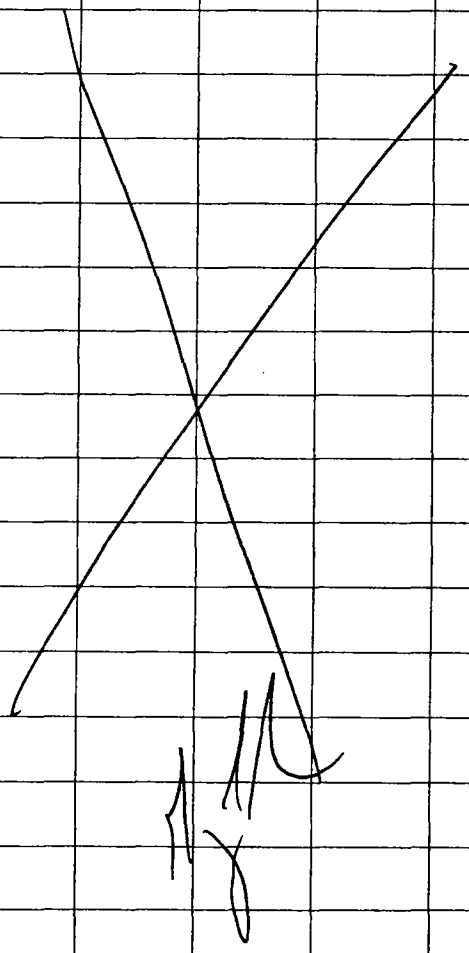
1715 Start developing W-2 (10 gpm)
I asked about bump posts around wells
Paul said they weren't going to put any in

1800 Stop pumping W-2
450 gal purged
Put casing on W-2
Clean up
Leave site

1850 Paul + Doug Frantz going to fire up W-10

Paul said he will do water levels + check pump in the morning and leave. Abe said he will talk to EKCO about purge waters in the drums + bulk tank





AMERICAN HOME PRODUCTS CORPORATION

FIVE GIRALDA FARMS, MADISON, NEW JERSEY 07940, (201) 660-5000

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

February 23, 1994

Sally Averill
United States Environmental Protection Agency
HRE-8J
77 West Jackson Blvd.
Chicago, IL 60604-3590

RE: Schedule for Interim Measures
EKCO Housewares, Massillon, OH

Dear Ms. Averill:

I received your February 8, 1994 letter approving the Draft Interim Measures workplan for the EKCO Housewares facility, on February 15, 1994. In your letter you requested a detailed schedule of tasks to be performed. The schedule is provided below.

• March 21, 1994	Site Mobilization
• March 21-22	Pull well pumps and perform geophysical logging
• March 22- April 1	Install casing liners in W-wells, retrofit R-wells, and abandon well D-4-30
• April 4- May 2	Collect weekly groundwater levels in shallow, intermediate and deep zone wells
• May 30	Submit draft IRM Report to EPA

If you have any further questions, please contact me at (201) 660-5590.

Sincerely,

Patricia W. McDonald

Patricia W. McDonald
Manager
Environmental Affairs

cc: G. Moss, AHPC
P. Landry, Weston

FEB 0 8 1994

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Pat McDonald
American Home Products Corporation
Five Giralda Farms
Madison, New Jersey 07940

HRE-8J

RE: Approval of Draft Interim Measures Work Plan
EKCO Housewares

Dear Ms. McDonald:

The United States Environmental Protection Agency (U.S. EPA) has reviewed your draft final Interim Measures (IM) Work Plan dated December 1993, for the EKCO Housewares facility in Massillon, Ohio.

While U.S. EPA does not necessarily agree with all the background information and conclusions stated in the Interim Measures Work Plan we are in agreement about the work to be completed under the Interim Measures, therefore, the proposed Interim Measures Work Plan is approved. Please submit a detailed schedule for the tasks required in the (IM) Work Plan within fourteen days of receipt of this letter.

If you should have any questions, please contact Sally Averill at (312) 886-4439.

Sincerely yours,

Joseph M. Boyle, Chief
RCRA Enforcement Branch

HRE-8J\Averill\sa-ab\6-4439\f:\user\share\mnoh.tes\im.app\February 3, 1994

OFFICIAL FILE COPY

CONCURRENCE REQUESTED FROM REB

SEC/BR SECRTRY			
	AB 3 Feb 94		2/7/94
OTHER STAFF	REB STAFF	REB SECTION CHIEF	REB BRANCH CHIEF
	SA 2/3/94	2-4-94	JMB 2/7/94

D.3.2

AMERICAN HOME PRODUCTS CORPORATION

FIVE GIRALDA FARMS, MADISON, NEW JERSEY 07940, (201) 660-5000

December 16, 1993

Sally Ann Averill
Office of RCRA, Region 5
US Environmental Protection Agency
HRE-8J
77 West Jackson Blvd.
Chicago, Illinois 60604-3590

Re: ECKO Housewares
Massillon, Ohio

Dear Ms. Averill:

Enclosed please find three copies of the "Draft Interim Remedial Measures (IRM) Work Plan" for the EKCO Housewares site in Massillon, Ohio.

As has been discussed, the purpose of this work plan is to seal the well casings of six wells and properly abandon one well. These activities should eliminate any interaquifer communication and contaminant migration between aquifers which may be occurring at the site.

Please note that following completion of the rehabilitation activities, water level measurements will be taken in wells in all aquifer units to delineate the existing capture zone. It will then be determined whether additional recovery wells in the shallow aquifer are needed to continue recovering all site-related contaminated groundwater.

Please review this report and contact me at (201) 660-5590 if you have any questions.

Thank you for your cooperation in this matter.

Sincerely,

Patricia Wells McDonald /amc

Patricia Wells McDonald

cc: L. Bove, Weston

WESTON WAY
WEST CHESTER, PA 19380
PHONE: 215-692-3030
TELEX: 83-5348

26 April 1991

Ms. Sally Averill
Project Manager
U.S. EPA - Region 5
230 S. Dearborn St.
Chicago, IL 60604

W.O. #2994-02-02

RE: Tank Tightness Test Report
EKCO Housewares, Massillon, OH

Dear Mr. Averill:

At the direction of American Home Products, WESTON is enclosing three copies of the IRM Report for the Underground Storage Tank Evaluation at the EKCO Housewares facility. The tank testing progressed as planned on 20 March 1991 under the observation of the EPA oversight contractor. The results of the test indicate that all four tanks were determined to not be leaking as defined within the accuracy of the test.

If there are any questions, please do not hesitate to contact Mr. Bob Zollner at (212) 878-5787 or Mr. H. G. Byer at (215) 344-3643.

Very truly yours,

ROY F. WESTON, INC.

Harold G. Byer, Jr.
Project Manager

HGB/lam

cc: R. Zollner - w/enclosures
T. Shingleton - w/enclosures
S. Schuyler - w/enclosures

WESTON WAY
WEST CHESTER, PA 19380
PHONE: 215-692-3030
TELEX: 83-5348

9 November 1990

Ms. Sally Averill
Project Manager
U.S. EPA Region 5
230 S. Dearborn St.
Chicago, IL 60604

W.O. #2994-02-02

RE: EPA Letter dated 12 October 1990

Dear Ms. Averill:

Thank you for your letter of 12 October 1990 responding to the additional IRM activity we proposed in our earlier telephone conversations and in the work plan we submitted on 23 August 1990. We are still attempting to obtain financial support from the corporation and also must coordinate the site activity with EKCO before work can start on this additional effort. However, we believe a response to your letter is necessary so you can see that work will progress as expected, as soon as some of the logistical details can be resolved. Our itemized response is as follows:

Item 1: The tightness test referenced in this item will utilize the Acu-Test Leak Computer System. This method is a temperature compensated, volumetric test system capable of detecting a leak in a tank(s) at a rate well within the 0.1 gal/hr capability noted in your letter of 12 October 1990. This system was the only system to meet and exceed all the U.S. EPA standards and was ranked first in their evaluation conducted at the Risk Reduction Laboratory in Edison, NJ. WESTON tested over 300 UST's in just over a one year time period using this system. It is used to test not only petroleum products, but chemical substances and hazardous waste tanks.

Item 2: The tanks we propose to test are the tanks located along the western side of the building. These tanks apparently are your major area of concern, although we also expect to test the gasoline tank on the south side of the building and the two oil storage tanks on the northeast side of the building. The tank numbers and contents are:

#2-Solvent Blend Tank U.G. (2M)
#3-Silicone Resin Tank U.G. (4M) (abandoned)
#4-Solvent Blend Tank U.G. (3M)
#5-Silicone Resin Tank U.G. (4M) (abandoned)
#1-Gasoline Tank U.G. (500 gal) (out of service)
#6-(2) No. 2 Fuel Oil Tanks U.G. (10M each)

WESTON SM

Item 3: The regulating agency will be called the Ohio State Fire Marshall (OSFM) in all future documents. U.S. EPA will be copied on all documents prepared in response to this work.

Item 4: 5,6,7 The tank(s) failing the 0.1 gal/hr leak test will be reported to the OSFM within the time period required by the regulations. If repairs are needed on any of the tanks, a permit will be obtained from the OSFM. If closure is necessary, guidance will be obtained from OSFM on proper closure methods and the OSFM will be notified 30 days prior to beginning closure activity. All closure activities will follow Federal and State guidelines.

Item 8: Additional interim measure activity can be discussed after more information about the USTs is developed. As stated previously, our preference is to pursue the RFI in order to define overall corrective measures rather than to approach the site on a piecemeal basis.

To date, we have submitted an application for a closure permit, a lagoon closure plan and a treatability study on the lagoon sludges to OEPA. In addition, we have submitted a report on interim measure activity already completed, the groundwater assessment plan and report and the RFI/CMS work plan to U.S. EPA. As we have stated before, we believe that both our and the Agency goals can best be achieved by an overall site response.

We will be happy to participate in additional discussions on this matter. Please contact Kevin Krause at (212) 878-5769 or H. G. Byer at (215) 344-3643 if you have any questions.

Very truly yours,

ROY F. WESTON, INC.

Harold G Byer Jr.

Harold G. Byer, Jr.
Project Manager

HGB/lam

cc: K. Krause - AHP
J. Shingleton - EKCO
M. N. Bhatla
Cameron Kerry
Steve Oster

5HR-12

OCT 12 1990

Mr. Thomas Shingleton
EKCO Housewares, Inc.
P.O. Box 560
Massillon, Ohio 44648-0560

Mr. Kevin Krause
American Home Products Corporation
685 Third Avenue
New York, NY 10017

Re: Approval of Interim Measures
Workplan
EKCO Housewares
OHD 045 205 424

Dear Messrs. Shingleton and Krause:

On August 24, 1990, the United States Environmental Protection Agency (U.S. EPA) received two copies of the American Home Products (AHP) Interim Measures Workplan for the underground storage tanks (USTs).

Also, on August 29, 1990, the U.S. EPA received a report from EKCO Housewares stating that the underground storage tanks at the facility never contained contaminants of concern.

After review of the EKCO Housewares report, the U.S. EPA has determined that the tanks could be sources of contamination. The high levels of volatile organic contaminants (VOC's) found in the soil gas survey and soil borings could be the result of the leakage of the products stored in the USTs, therefore, the U.S. EPA is requiring interim measures to be conducted at the site.

The U.S. EPA approves the workplan with the following modifications:

1. The tightness test must be capable of determining a 0.1 gallon per hour leak for both the tanks and the ancillary equipment;

2. Indicate which tanks will be tested;

3. Change the reference from Ohio Environmental Protection Agency (OEPA) to the Ohio State Fire Marshall (OSFM). The OSFM is the regulating agency;

4. If a tank fails a leak test at 0.1gl/h leak rate, then it must be reported to OSFM within 24 hours of discovery;

5. If repairs are needed on tanks, EKCO must obtain a permit from OSFM prior to beginning repairs;

6. If closure is required of the tanks, OSFM must be notified 30 days prior to the beginning of tank closure. OSFM will the provide guidance on how to properly close a tank.

   Closure of a tank in place is highly unusual, unless the tank removal would interfere with the structure of the building;

7. All closure activities must be completed in accordance with Federal and State requirements or guidelines; and

8. If a leak is detected from the UST's, further interim measure activities may be required.

If you have any questions concerning this letter, please contact Sally Averill at (312) 886-4439.

Sincerely yours,

William E. Muno, Chief
RCRA Enforcement Branch

Enclosure

bcc: Gerald Phillips, UST

5HR-12:SAVERILL:ao:6-4439:9/25/90:EKCO.LTR

RCRA ENFORCEMENT	REB STAFF	REB SECTION CHIEF	REB CHIEF
INIT.	SA		RED
DATE	10/3	10/9	10-11-90

10/3

10/10/90

(Confirmation Of FAX)

EKCO®
HOUSEWARES, INC.

August 29, 1990

Ms. Sally Averill
U. S. Environmental Protection Agency
Region V
230 South Dearborn Street
5HR-12
Chicago, Illinois 60604

Re: Ekco Housewares Inc.
Massillon, Ohio

Dear Ms. Averill:

In response to EPA Region V's request for proposals for interim remedial measures at this facility and the IRM plan relating to underground storage tanks submitted last Friday, August 24, 1990, by American Home Products Corporation, I am submitting a report demonstrating that the underground storage tanks involved have never contained contaminants of concern.

Consistent with your communications last week with Steven Oster and Cameron Kerry, counsel for AHP and Ekco respectively, therefore, I understand that the underground storage tanks will not be considered an appropriate subject of interim measures.

Sincerely,

EKCO HOUSEWARES, INC.

Thomas J. Shingleton
Plant Manager

TJS/lm

CC: Harold Byer
Steven Oster
Jeffrey Weinstein
Cameron Kerry
Ron Fox

3880y

P.O. Box 560 • Massillon, Ohio 44648-0560 • Telephone 216/832-5026

TANK NO.	CAPACITY (GAL.)	YEAR INSTALLED	CURRENT SUBSTANCE	DID TANK CONTAIN ANOTHER SUBSTANCE	LOCATION TO BUILDING
1	500	1981	Gasoline Empty - (Abandoned) 1989	No	South
2	2,500	1980	Thinner Solvent For Silicone (1)	No	Southwest
3	4,000	1983	Never In Use	No	Southwest
4	3,000	1983	Thinner Solvent For Silicone (1)	No	West
5	4,000	1983	Never In Use	No	West
6A	10,000	1974	No. 2 Fuel Oil - Empty - Abandoned 1985	No	East
6B	10,000	1974	Empty - Abandoned 1985	No	East
7	500	1961	Kerosene Empty - (Removed) 1985	No	East

(1) Solvent Package Is Comprised Of: (By Weight) 49.5% Naptha
33.0% Isobutyl Isobutyrate
17.5% Toluene

TABLE OF CONTENTS

A F F I D A V I T

I, James O. Epps, have been employed at Ekco Housewares, Inc., Massillon, Ohio, since July 17, 1950 in various managerial positions. I have been Chief Engineer since 1970. All the underground storage tanks located at Massillon, Ohio facility have been installed since I have been employed at the facility. I am familiar with the uses and contents of these tanks. To the best of my knowledge, during the entire period since they were installed, all of the tanks have been used only for storage of petroleum products or thinner comprised of Naptha, Isbutyl Isobutyrate and Toluene, and no other substances, as follows:

Tank No. 1. This 500 gallon tank was installed in 1981 to store gasoline and to the best of my knowledge was never used to store any other substance. The tank was emptied and abandoned in 1988.

Tank No. 2. This 2,500 gallon tank was installed in 1980 and observed by the City Fire Marshal's office. The tank has contained since that year only the thinner for silicone comprised of (by weight) 49.5% Naptha, 33.0% Isobutyl Isobutyrate and 17.5% Toluene, and to the best of my knowledge was never used to store any other substance.

Tanks No. 3 and 5. These two 4,000 gallon tanks were installed in 1983 for the purpose of housing a new formulation of silicone which was never developed, and to the best of my knowledge these tanks have never been used for any substance since this original installation in 1983.

Tank No. 4. This 3,000 gallon tank was installed in 1983 and observed by the City Fire Marshal's office. The tank has contained since that year only, the thinner for silicone comprised of (by weight) 49.5% Naptha, 33.0% Isobutyl Isobutyrate and 17.5% Toluene, and to the best of my knowledge was never used to store any other substance.

Tanks No. 6A and 6B. These two 10,000 gallon tanks were purchased and installed in 1974 for the purpose of storing No. 2 Fuel Oil to provide an energy source to two (2) converted gas fired low pressure boilers used for manufacturing process. These tanks were emptied and abandoned in 1985, and to the best of my knowledge have never contained any substance other than No. 2 Fuel Oil.

Tank No. 7. This 500 gallon tank to store kerosene was installed in 1961. This tank was emptied and removed from the ground in 1985. To the best of my knowledge it never contained any other substance than kerosene.

SIGNED:

James O. Epps

JAMES O. EPPS
CHIEF ENGINEER

WITNESS: Genevieve L. Maccioli

GENEVIEVE L. MACCIOLI
NOTARY PUBLIC, STARK COUNTY, OHIO
MY COMMISSION EXPIRES 5-14-1992

ACCT'G. NO.	JOB OR AHT NO.	DELIVER TO	REQ. BY	REQ. NO.
05-1810-1598B			Jim Epps	None

EKCO.

EKCO HOUSEWARES COMPANY
DIVISION OF AMERICAN HOME PRODUCTS CORPORATION

PURCHASE ORDER NO. **60052**
THIS NUMBER MUST APPEAR ON ALL INVOICES, PACKAGES AND CORRESPONDENCE

PURCHASE ORDER

95

VENDOR

Campbell Oil Company
611 Erie Street, South
Massillon, Ohio 44646
Attn: Del Phillips

SHIP AND INVOICE TO

Ekco Housewares Company
359 State St N W (Box 560)
Massillon, Ohio 44646

DATE WANTED	TERMS	SHIPPING POINT	F.O.B.	SHIP VIA	P. O. DATE
Wk. of 3/17/80	Net 20		Massillon	Deliver	3/12/80

☐ FOR RESALE ☐ FOR CONSUMPTION PLEASE REFER ANY INQUIRY CONCERNING THIS ORDER TO Frank Boehm

ITEM NO.	QUANTITY	UNIT	EKCO PART NO.	DESCRIPTION (Show All Specific Details Not Covered In Specifications or Drawing)	UNIT PRICE
	1	only		2000 Gallon U.G. Storage Tank 64" x 12' Long	$690.00
				7 Gauge - Asphalt coated	
				Installation Charge	$1,000.0
				NOTIFY JIM EPPS ON ARRIVAL	

CONFIRMING DEL PHILLIPS

95

[redacted]

REQUISITIONER'S COPY

Account No.	Job or A. H. T. No.	Deliver To	Req. By	Req. No.
[redacted]-1101		Massillon	J. Zppa	62557

EKCO

EKCO HOUSEWARES COMPANY

DIVISION OF AMERICAN HOME PRODUCTS CORPORATION

PURCHASE ORDER NO. **40739**
This number must appear on all invoices, packages and correspondence.

PURCHASE ORDER

VENDOR # _____

Campbell Oil Company
611 South Erie Street
Massillon, Ohio 44646

Ship to this area if shown as code Z

Ship To Location Code: 3

Bill To Location Code: 6

(48)

Date Requested: 10/25/63 Date Promised: Same	Terms	Shipping Point	F.O.B.	Ship Via	P.O. Date
	net 30	Massillon	delivered	B/Way	10/14/63

Item	Quantity	Unit	Code	EKCO Part No.	Description (Show specific details)	Unit Price	Extension
1	2	only			4000 gal. Asphelt coated underground tanks	$1,450.00 ea.	
2	1	only			3000 gal. Asphelt coated underground tank	$1,350.00 ea	
3					All piping, labor, associated material to bury the above tanks with saddles	NOT TO EXCEED $8,972.00	
					120		11,222.00
					/For Silicone Line NOTE: For Accounting $2,950.00) 6,000.00) Accrue to 5% Cont. 1,350.00) 922.00) Paint Room Tank		

☐ Confirming: _____

☐ Nonconfirming:

TOTAL VALUE ▶

☒ TAX EXEMPT
Permit Numbers { Illinois 060-150 / Ohio 97-100331 / Penn. 36-04751-5

☐ TAXABLE

☐ INVOICE MATERIAL AND LABOR SEPARATELY: MATERIAL TAXABLE, LABOR NON-TAXABLE

This order expressly limits acceptance to the terms of the order and any additional or different terms proposed by the seller are rejected unless expressly assented to in writing by the buyer.

SHIP TO AND BILL TO CODE EXPLANATION

A	EKCO Housewares Co. 9234 W. Belmont Ave. Franklin Park, IL 60131	E	EKCO Housewares Co. 1250 Bedford Ave. S.W. Canton, OH 44710	I	Adams Plastics 191 Appleton St. Holyoke, MA 01040
B	EKCO Housewares Co. [redacted]34 W. Gage Ave. [redacted]anklin Park, IL 60131	F	EKCO Housewares Co. P.O. Box 9028 Canton, OH 44711	J	Adams Plastics P.O. Box 831 Holyoke, MA 01041
C	EKCO Housewares Co. 1949 N. Cicero Ave. Chicago, IL 60639	G	EKCO Housewares Co. 359 State St. Ext. N.W. P.O. Box 560 Massillon, OH 44648-0560	K	EKCO Wood Products Route 26 P.O. Box 165 Locke Mills, ME 04255
D	EKCO Housewares Co. 4701 W. Cortland Ave. Chicago, IL 60639	H	Slaymaker Lock Co. 115 South West End Ave. Lancaster, PA 17603	Z	See typed address above

Please refer inquiry to:

at location code: Frank Zacha

Buyer _____ Code [redacted]

Phone:

...portant: you must comply with the instructions below.
1. Issue a separate invoice for each order number.
2. Invoice must be accompanied by original bill of lading or express receipt.

FORM PUR-8
PRINTED IN U.S.A.

PURCHASE REQUISITION
EKCO PRODUCTS COMPANY

G 32-4

Standard Order Quantity 1000 Unit GALLON Item No. 7492400

Item Name/ Description SILICONE BLEND AS FOLLOWS: Ekco Blend #2531

	Per Gal.	PARTS BY Weight	PARTS BY Volume
A) Special Naphtholite 663	6.283	49.5	53.0
B) Isobutyl Isobutyrate	7.13	33.0	30.9
C) Toluene	7.26	17.5	16.1

Used On

~~Harry~~ 9 gal (69¢) Ph
~~E/##~~ Ph 238-8550
David HIBJAN

TANK GRAVITY = 2008

Venders		Terms	Shipping Point	Ship Via	F.O.B.
1	Chemcentral (Ph 238-8550) 21600 Drake Road Cleveland, Ohio 44136	Net 30	Cleve	B/Way	Mass
2					
3					
4					

Buyer	Plant or Warehouse	Department	Notify On Arrival	Project or Cost Est. No.	Account No.
	MASSILLON				05-1311-05-32

Date 1980	Quantity To Order	Delivery Schedule	On Hand & Order	Monthly Average	Dept. Head Approval	Exec. Approval	Purch. Agent Approval	Date	Purchase Order No.	Vendor	Unit Price GAL.
4/7	1000	Qty. 1000 KEY...; Want 4/8						4/7	Conf. 60238	1	$1.894
11/11/80	1500	Qty. ASAP; Want 11/12; KEY PUNCHED	914 / 0		cu	[illegible]	SB	11/11/80	Conf. 11/11 Joan 78538	1	1.9146
1/20/81	1500	Qty. 1500; Want 1-26; KEY PUNCHED	86F / 0	1104	[illegible]	[illegible]	SB	1/20/81	Conf. 1/20 Linda 82172	1	1.93
2/20/81	1500	Qty. 1500; Want 3-3; KEY PUNCHED	775 / 0		cu	[illegible]	SB	2/23/81	Conf. Shirley Johnson 89857	1	1.91 gal
3/27/81	1500	Qty. 1500; Want 4-2; KEY PUNCHED			cu	[illegible]	SB	3/30/81	Conf. Jim Forester 90429	1	2.0878
4/20/81	1500	Qty. 1500; Want 5-1; KEY PUNCHED			cu	[illegible]	SB	4/22/81	Conf. 4/22 Linda 90687	1	2.1953
5/24/81	1500	Qty. 1500; Want 6-8; KEY PUNCHED			cu	[illegible]	SB	5/27/81	Conf. Linda 90978	1	5-27 2.1953
7/13/81	1500	Qty. 1500; Want 7-20; KEY PUNCHED	924 / 0	1501	[illegible]	[illegible]	SB	7/14/81	Conf. 7/14 Joann 96698	1	2.1953
8/4/81	1500	Qty. 1500; Want 8-11; KEY PUNCHED	964 / 0	1800	[illegible]	[illegible]	SB	8/5/81	Conf. 8/5 Linda 96905	1	2.1953
8/1?/81	1500	Qty. 1500; Want 8/27; KEY PUNCHED				[illegible]	SB	8/19/81	Conf. JoAnn 00532	1	2.1953
9/1/81	1500	Qty. 1500; Want 9/10; KEY PUNCHED				[illegible]	SB	9/1/81	Conf. 9/1/81 Linda [redacted]	1	2.193
9/21/81	1500	Qty. 1500; Want 9/24; KEY PUNCHED				[illegible]		[redacted]	...07	1	Linda 2.193

(over)

Silicone Blend (Ekco# 2531) 32-4

ITEM No. 7492400

Date	Quantity To Order	Delivery Schedule	On Hand & Order	Monthly Average	Dept. Head Approval	Exec. Approval	Purch. Agent Approval	Date	Purchase Order No.	Vendor	Unit Price
9/23/81	6000 R	6000 / 2 Hom... HFR (Min 1000 ...) KEY PUNCHED						9/23	OC...	1	2.25 / 2.11
11/12/81	6000 R	6000 KEY PUNCHED Hold for Release	1600 / 981	2800			SB	11/12/81	Conf Dan Moore 02674	1	2.25
1/21/82	6000 R	6000 KEY PUNCHED Hold for Release	1026 / 1953	2810			SB	1/21/82	Conf 1/21 Sharon 04212	1	2.25
4/20/82	6000 R	6000 KEY PUNCHED Hold for Release	972 / 946	2348			SB	4/20/82	Conf 4/20 Linda 08825	1	2.25
7/8/82	6000 R	6000 KEY PUNCHED Hold for Release	764 / 986	2316			SB	7/9/82	Conf 7/9 Linda 04262	1	2.25
8/17/82	6000 R	6000 (Hold for Release)	1500 / 2000	2800			SB	8/17/82	Conf 8/18 Linda 04499	1	2.25
10/11/82	6000 R	6000 (Hold for Release)	1101 / 997				SB	10/12/82	Conf 10/12 Lucy 18270	1	2.25
12/13/82	6000 R	6000 KEY PUNCHED (Hold for Release)	2344 / 968	3100			SB	12/13/82	Conf Lucy 23645	1	2.25
2/17/83	6000 R	6000 (Hold for Release)	1310 / 1942	2860			JB	2/18	Conf 2/18 Todd 26719	1	2.25
5/17/83	6000 R	6000 (Hold for Release)	1367 / 944	2276			SB	5/17/83	Conf 5/19 Lucy 33053	1	2.25
7/26/83	6000 R	6000 Hold ... KEY PUNCHED					JB	7/26	Conf Todd 7-26 39269	1	2.25
8/15/83	12000 R	12000 (Hold for Release)	1334 / 5000	4500			SB	8/15/83	Conf Linda 39457	1	2.25
12/21/83	12000 R	12000 (Hold for Release) KEY PUNCHED	1765 / 1942	29.4			SB	12/21/83	42555	1	2.25
4/6/84	12000 R	12000 KEY PUNCHED Hold for Release	2000 / 3852	3608			SB	4/6/84	47959	1	2.25
7/20/84	12000 R	12000 (Hold for Release) PUNCHED	2218 / 3942	5200			SB	7/20/84	55046	1	2.25
10/18/84	12000 R	12000 (As Released) PUNCHED	3357 / 2980	5000			SB	10/19/84	56784	1	2.25
1/31/85	12000 R	12000 KEY PUNCHED	4850 / 1893	5800				1/31	Conf Rick 64463	1	2.25
5/13/85	12000 R	12000 (As Required)	3825 / 2876	3160			SB	5/14/85	65993		2.25
8/21/85	12000 P	12000 (As Required) KEYPUNCHED BY	4360 / 3300	4140			SB	8/22/85	68150	1	2.25
11/21/85	12000	12000 (As Required) KEYPUNCHED BY	3512 / 2011	3800			SB	11/21/85	73308	1	2.25
3/7/86	12000	12000 (As Required) KEYPUNCHED BY	3623 / 2865	3639			[redacted]		7581		2.25 / 2.21

Form No. PUR-3 [illegible]

PURCHASE REQUISITION

EKCO HOUSEWARES CO.

G-32-4

Standard Order Quantity 1000 Unit Gallon Item No. 7492400

Item Name/Description SILICONE BLEND AS FOLLOWS: (EKCO BLEND #2531) (Chemcentral)

Do Not Type Following on P.O.:

	Per Gal.	PARTS BY Weight	PARTS BY Volume
A) Special Naphtholite 663	6.283	49.5	53.0
B) Isobutyl Isobutyrate	7.13	33.0	30.9
C) Toluene	7.26	17.5	16.1

Used On

Bison: Isotoxa Solvent Mix

	Vendors	Terms	Shipping Point	Ship Via	F.O.B.
1	Chemcentral (Ph 238-8550) PO Box [illegible] ~~21600 Brake Rd.~~ Cleveland, Ohio ~~44146~~ 44136	Net 30	Cleveland	Truck ~~Cheapest~~	Massillo
2	Bison	Net 30	Canton	Delivered	Msln
3					
4					

Buyer	Plant or Warehouse	Department	Notify On Arrival	Project or Cost Est. No.	Account No.
	Massillon				05-1311-05-32

Date	Quantity To Order	Delivery Schedule	On Hand & Order	Monthly Average	Dept. Head Approval	Exec. Approval	Purch. Agent Approval	Date	Purchase Order No.	Vendor	Unit Price Gal.
7/3/86	12000 R	Qty. 12000 (As Required) KEYPUNCHED BY M.M.	3413 / 2962	3579	[illegible]	[illegible]	[illegible]	7/3/86	09203	1	2.22
10/6	12000 R	Qty. 12000 (As Required) KEYPUNCHED BY M.M.	4296 / 3021	2599	[illegible]	[illegible]	[illegible]	10/6/86	09732	1	2.22
3/13/87	6000 ~~12000~~ R	Qty. 6000 ~~12000~~ (As Required) KEYPUNCHED BY M.P.	2396 / 3869	2436 ~~3053~~	[illegible]	[illegible]	[illegible]	3/13/87	Chrysler 15391	2	1.98
5/18/87	6000 R	Qty. 6000 (As Required) KEYPUNCHED BY M.P. Chemcentral			[illegible]	[illegible]	[illegible]	5/19/87	15855	1	2.06
5/18	6000 R	Qty. 6000 (As Req'd) KEYPUNCHED BY M.P. Bison			[illegible]	[illegible]	[illegible]	5/19/87	15856	2	1.98
8/19	6000 R	Qty. 6000 (As Req'd)	4561 / 3886 ~~3000~~	3927+	[illegible]	[illegible]	[illegible]	8/24/87	16960	2	1.98
10/6	6,000 R	Qty. 6,000 (As Req'd) KEYPUNCHED BY	2632 / 1500	3318	[illegible]	K	[illegible]	10/8/87	21420 Chem	2	1.98
10/17	6,000	Qty. 6,000 (As Req'd)				[illegible]	[illegible]	10/19/87	21448	1	1.76
1/6/88	6000 R	Qty. 6000 (As Req'd)			[illegible]	[illegible]	[illegible]	1/7/88	22031	2	1.89
2/9/88	9000 ~~12000~~	Qty. 9000 (As Req'd)	4913 / 0	3763	[illegible]	[illegible]	[illegible]	2/1[redacted]		2	1.89
2/9	3000	Qty. 3000 (As Req'd)				[illegible]		1/88	22318	1	1.76

1 - Chemcentral ✓
2 - Bison ✓

Item No. 7492400

Date	Quantity To Order	Delivery Schedule	On Hand & Order	Monthly Average	Dept. Head Approval	Exec. Approval	Purch. Agent Approval	Date	Purchase Order No.	Vendor	Unit Price
4/7/88	6000 R	Qty. 6000 Want Prom. Qty. As Req'd Want Prom. Qty. Chemcentral Want Prom.	2527 / 3500	4000	883	[illegible]	[illegible]	4/8/88	23152	1	1.76
4/7/88	6000 R	Qty. 6000 Want Prom. Qty. As Req'd Want Prom. Qty. Bison Want Prom.				[illegible]	[illegible]	4/8/88	23153	2	~~1.89~~ 1.99
8/17/88	4500 R	Qty. 4500 Want Prom. Qty. (As Required) Want Prom. Qty. Chemcentral Want Prom.	4871 / 4500	4000	883	[illegible]	[illegible]	8/17/88	26638	1	1.76
8/17/88	4500 R	Qty. 4500 Want Prom. Qty. (As Required) Want Prom. Qty. Bison Want Prom.				[illegible]	[illegible]	8/17/88	26639	2	1.99
11/9/88	3000 R	Qty. 3000 KEYPUNCHED BY M.P. Want Prom. Want Prom. Want Prom.	3412 / 3500		883	[illegible]	[illegible]	11/9/88	27317	1	1.76
11/9	3000 R	Qty. 3000 As Req'd KEYPUNCHED BY M.P. Want Prom. Qty. Want Prom. Qty. Want Prom.				[illegible]	[illegible]	11/9/88	27318	2	1.99
1/18/89	3000 R	Qty. 3000 KEYPUNCHED BY M.P. Want Prom. Want Prom. Want Prom.	4295 / 1479	3592	883	[illegible]	[illegible]	1/19/89	29636	2	1.99
1/18/89	3000 R	Qty. 3000 Want Prom. Qty. As Req'd Want Prom. Qty. Want Prom.			883	[illegible]	[illegible]	1/19/89	29637	1	1.965 ~~4.91~~
2/27	3000 R	Qty. 3000 Want Prom. Qty. As Req'd Want Prom. Qty. Bison Want Prom. KEYPUNCHED BY M.P.			883	[illegible]	[illegible]		30543	2	[illegible]
4/26/89	6000 R	Qty. 6000 KEYPUNCHED BY Chem. Want Prom. Want Prom. Want Prom.	3400 / 1500	3592	883	[illegible]	[illegible]	4/27/89	30976	1	1.965
4/26/89	6000	Qty. 6000 KEYPUNCHED BY Bison Want Prom. Want Prom. Want Prom.			883	[illegible]	[illegible]	4/27/89	30977	2	2.05
		Qty. Want Prom. Qty. Want Prom. Qty. Want Prom.				5/89		Chemcentral [illegible]			
7/26	6000 R	Qty. 6000 KEYPUNCHED BY As Req'd Chemcentral Want Prom. Want Prom. Want Prom.			883	[illegible]	[illegible]	7/27/89	35341	1	1.96
7/26	6000 R	Qty. 6000 Want Prom. Qty. As Req'd Want Prom. Qty. Bison Want Prom.			883	[illegible]	[illegible]	7/27/89	35342	2	2.05
10/7	6000 R	Qty. 6000 KEYPUNCHED BY As Req'd Chemcen Want Prom. Want Prom. Want Prom.	3767 / 4500	3600	883	[illegible]	[illegible]	10/9/89	37936	1	1.960
10/7	6000 R	Qty. 6000 KEYPUNCHED BY M.P. As Req'd Bison Want Prom. Want Prom. Want Prom.			883	[illegible]	[illegible]	10/9/89	37958	2	2.05
12/28/89	6000 R	Qty. 6000 KEYPUNCHED BY M.P. Qty. As Req'd Want Prom. Want Prom. Qty. Want Prom.	1754 / 7000		883	[illegible]	[illegible]	12/29/89	38786	2	2.05
4/6/90	6000 R	Qty. 6000 Want Prom. Qty. As Req'd Want Prom. Qty. Want Prom.	4500 / 6000		883	[illegible]	[illegible]	4/6/90	39075	1	1.96
5/3/90	6000	Qty. 6000 KEYPUNCHED Want Prom. Qty. As Req'd Want Prom. Qty. Want Prom.	3049 / 4676		883	[illegible]	[illegible]	5/3/90	42357	2	2.05
5/3/90	6000	Qty. 6000 Want Prom. Qty. As Req'd Want Prom. Qty. Want Prom.			883	[illegible]	[illegible]	5/3/90	42358	1	1.96
		Qty. Qty. Qty.							[redacted]		

WESTON WAY
WEST CHESTER, PA 19380
PHONE: 215-692-3030
TELEX: 83-5348

MANAGERS DESIGNERS/CONSULTANTS

23 August 1990

Ms. Sally Averill
Project Manager
U.S. EPA Region 5
230 S. Dearborn St.
Chicago, IL 60604

W.O. #2994-02-02

Re: IRM UST Work Plan
EKCO Housewares, Massillon, OH

Dear Ms. Averill:

At the direction of American Home Products (AHP), WESTON is submitting an IRM Work Plan requested in the EPA letter of 13 July 1990. The Work Plan addresses the management and characterization of all Underground Storage Tanks (USTs) present at the EKCO site and is the result of our conference call on 26 July 1990.

One of the IRM activities addressed during our conference call involved a discussion on the use of vacuum extraction, sometimes known as in-situ volitization (ISV). While we have, at your request, given careful thought to utilizing ISV at this time we are not presently proposing ISV as the IRM step. This is due to a number of factors, including:

- There may be other technologies available to treat the area of concern and these alternatives would need to be addressed in the CMS.
- ISV cannot be used at every site. Without a detailed pilot study considering site subsurface conditions (porosity, permeability), proper spacing of an array of vents and the properties of the compounds to be extracted, ISV at this time seems premature.
- An imminent threat to human health at the EKCO site does not appear to be a problem.
- A RFI/CMS Work Plan is under review by the Agency. The intent of the RFI/CMS program is to analyze and select the most feasible alternative to correct environmental problems at the site. The CMS usually details the available and preferred options for remediation at a site and will include the use of ISV as a remedial measure. The CMS should properly be utilized in this manner.

Therefore, the attached UST management plan, to include tank testing and the possible removal of USTs, is presented based on the results of our previous discussion. Please contact either Mr. Kevin Krause at (212) 878-5092 or Mr. H. G. Byer at (215) 344-3643 if there are any additional concerns or if we can answer any questions.

Very truly yours,

ROY F. WESTON, INC.

Harold G. Byer, Jr.
Project Manager

HGB/lam

cc: K. Krause - AHP
T. Shingleton - EKCO
G. Moss - AHP
M. N. Bhatla, WESTON
W. Celenza, WESTON
S. Oster - Willkie, Farr & Gallagher

WILLKIE FARR & GALLAGHER

Washington, DC
New York
London
Paris

August 10, 1990

VIA FEDERAL EXPRESS

Ms. Sally Averill
United States Environmental
Protection Agency
230 South Dearborn Street
5HR-12
Chicago, Illinois 60604

Re: EKCO Housewares, Inc.
Massillon, Ohio

Dear Sally:

This is to confirm that EKCO's time to submit an Interim Measures Plan regarding the tanks has been extended to and including Friday, August 24, 1990.

Very truly yours,

Steve Oster

cc: Geraldine A. Moss, Esquire
Cameron Kerry, Esquire
Mr. Kevin Krause

Three Lafayette Centre
1155 21st Street, NW
Washington, DC 20036-3302
202 328 8000

Telex: RCA 229800
WU 89-2762
Fax: 202 887 8979
202 331 8187

WILLKIE FARR & GALLAGHER

Washington, DC
New York
London
Paris

July 24, 1990

VIA FEDERAL EXPRESS

Ms. Sally Averill
United States Environmental
Protection Agency
230 South Dearborn Street
5HR-12
Chicago, Illinois 60604

Re: EKCO Housewares, Inc.
Massillon, Ohio

Dear Sally:

This is to confirm that EKCO's time to submit an Interim Measures Plan regarding the tanks has been enlarged by a period of fifteen (15) days.

Very truly yours,

Steve Oster

cc: Geraldine A. Moss, Esquire
Cameron Kerry, Esquire

Three Lafayette Centre
1155 21st Street, NW
Washington, DC 20036-3302
202 328 8000

Telex: RCA 229800
WU 89-2762
Fax: 202 887 8979
202 331 8187

5HR-12

JUL 13 1990

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Thomas Shingleton
EKCO Housewares, Inc.
P.O. Box 560
Massillon, Ohio 44648-0560

Mr. Timothy McGuinness
American Home Products Corporation
685 Third Avenue
New York, New York 10017

Re: Request for Interim Measures
EKCO Housewares
OHD 045 205 424

Dear Messrs. McGuinness and Shingleton:

The United States Environmental Protection Agency (U.S. EPA) has reviewed material submitted in your Remedial Facility Investigation/Corrective Measures Study (RFI/CMS) workplan and in your Groundwater Quality Assessment Report and has determined that interim measures are needed at the above cited facility.

The concentration of volatile organic compounds (VOC's) found in soil borings SB-11 and SB-13 (90,082 ppb and 140,168 ppb respectively) and results from the soil gas survey indicates that the old tank farm area is a current or potential threat to human health and the environment.

In a conversation between Sally Averill and Tim McGuinness on June 22, 1990, Tim indicated that the tanks in the old tank farm area had not been removed and that one of the tanks may still be in use. Based on the above information, the U.S. EPA has reason to believe that interim measures are necessary in the old tank farm area to reduce the VOC concentration in the soil. Pursuant to Section IV, Paragraph A of the Consent Order issued under Section 3008(h) of RCRA, EKCO Housewares must submit to U.S. EPA for approval within ten (10) days of receipt of this notification, an Interim Measures Workplan to mitigate this potential threat to human health and the environment at the old tank farm area.

If you should have any questions concerning this matter, please contact Sally Averill at (312) 886-4439.

Sincerely yours,

ORIGINAL SIGNED BY
WILLIAM E. MUNO
William E. Muno, Chief
RCRA Enforcement Branch

5HR-12:SAVERILL:sbowie:6-4439:6/26/90:ekco.req

	TYP.	AUTH.	IL/IN TECH. ENF. SEC.	MI/WI TECH. ENF. SEC.	OH/MN TECH. ENF. SEC.	IL/MI/WI ENF. PROG. SECTION	MI/MN/OH ENF. PROG. SECTION	RCRA ENF. BR. CHIEF	O.R. A.D.D.	WMD DIR
UNIT. DATE	7/9	7/9			7/10/90			7/11/90		

[illegible] 0 6 1988

SHE-12

Timothy McGuiness, Manager
Environmental Engineering
685 Third Avenue
New York, New York 10017-4085

Re: Ekco Housewares, Inc.
OHD 045 205 424

Dear Mr. McGuiness:

We have reviewed Ekco Housewares, Inc.'s Draft Interim Measures Plan (IMP) which was received by the United States Environmental Protection Agency (U.S. EPA) on December 9, 1987. Some revisions as detailed below will be necessary before your plan can be accepted by the U.S. EPA.

This Agency, after consultation with the Ohio Environmental Protection Agency (OEPA), has decided not to address the National Pollutant Discharge Elimination System (NPDES) violations as detailed in Mr. Dan Powell's October 28, 1987, letter to Mr. Shingleton as an Corrective Action Order Interim Measure. Furthermore, the testing and flow analysis requested by Mr. Powell is not duplicative of any activities currently under way pursuant to the November 9, 1987, Partial Consent Agreement and Order.

The following revisions shall be incorporated into your Interim Measures Plan:

2-27-89

1. The cover letter of December 7, 1987, addressed to Ms. Susan Prout, U.S. EPA, Office of Regional Counsel, from Mr. Steve Outer describes the Draft Interim Measures Plan as the "Final Interim Measures Report". Please refer to this document as the Draft Interim Measures Plan in all further communication;

New

2. Provide as much data as possible concerning the two piezometer wells identified on page 4, Figure 2; [illegible]

3. Clarify the statement on page 14 "the groundwater [illegible] [illegible] from 8 to 26 feet below the ground surface [illegible] [illegible] to the potentiometric surface";

As [illegible]

4. [illegible] the statement on page 14 that unconsolidated [illegible] and [illegible] Sandstone function as the separate [illegible] [illegible]

5. Delete the word "confirmation" and replace with "opinion" in both locations in the last paragraph on page 14. Mr. Donald Snyder of the Ohio Water Service Company clearly states that there is a remote possibility that residences may have a private well as a second source of water.

6. Add to conclusion number 3, sentence one "...Echo facility based on the review of the Ohio Water Service Company records.";

7. On page 20, 2nd paragraph, delete "while no immediate threat to potable water supplies has been identified". Also state that pumping will be increased at W-10 within ~~fifteen (15)~~ days of the approval of the IWP by the U.S. EPA:

8. Add to the last paragraph on page 20 that the three piezometer wells will be installed within fifteen (15) days of the approval of the IWP and that further construction will be approved by the U.S. EPA or its representative; and

9. Recently (December 31, 1987), our Agency received the analytical results from the Ohio Environmental Protection Agency's (OEPA) sampling of Massillon water wells 1, 2, 3, and 5 on November 17, 1987. The presence of vinyl chloride and 1,1 Dichloroethane at well #1 was confirmed. Therefore, we request that Massillon's wells #1, 2, 3, and 5 be sampled quarterly until your Groundwater Quality Assessment Program determines the rate and extent of groundwater contamination from your facility. The first sampling round of drinking water wells will occur within fifteen (15) days of the approval of the IWP by U.S. EPA.

Hopefully all these revisions will be incorporated in your plan and a Final Interim Measures Plan submitted at our January 7, 1988, meeting. Please call Walter Nied of my staff at (312) 886-6898, if you have any questions concerning these revisions.

Sincerely yours,

[redacted]

William E. Muno, Chief
RCRA Enforcement Section

cc: Dan Powell, OEPA-NEDO
[redacted], OEPA-CO
[redacted], OEC

ATTACHMENT I

SCHEDULE FOR IMPLEMENTATION OF ADDITIONAL
INTERIM MEASURES, EKCO PLANT,
MASSILLON, OHIO

Schedule

1. Increased pumpage of W-10:

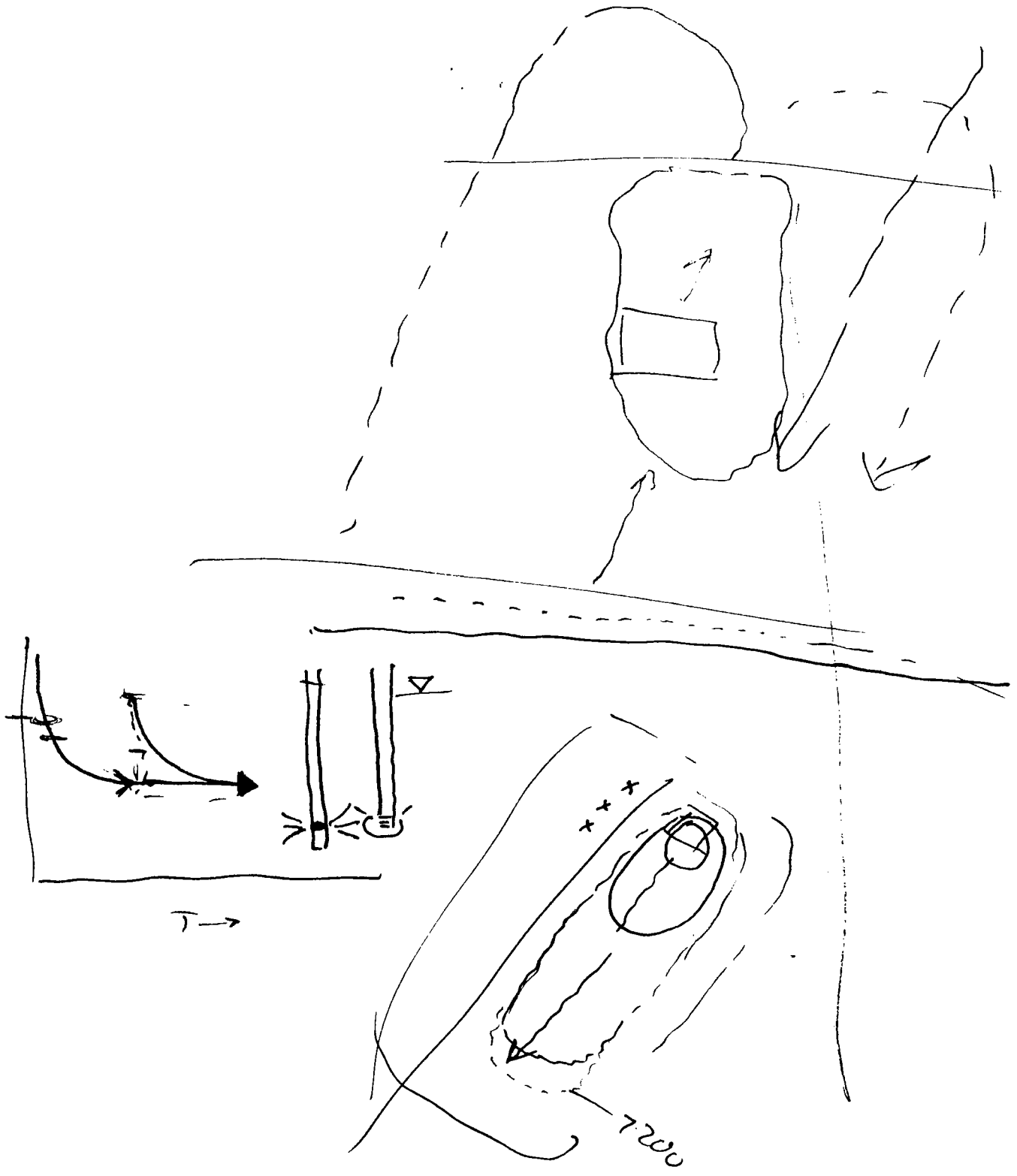
   A. Receive 400 gpm pump - week of 3/7/88
   B. Install new pump - week of 3/14/88
   C. Pump test to establish optimum pump rate - weeks of 3/21/88 and 3/28/88
   D. Operational - week of 4/4/88

2. Sampling of Ohio Water Company well #1, 2, 3, and 5:

   A. Begin monthly sampling of wells - week of 2/8/88
   B. Sample monthly - second week of each month
   C. Reassess sampling schedule after receipt of three round of analytical results

3. Installation of 3 piezometers

   A. Obtain access to neighboring properties: If access cannot be obtained by EKCO by 1 March, USEPA will be requested to assist in obtaining access
   B. Mobilize well drillers - within 3 weeks of obtaining property access
   C. Drilling and installation - 1 week
   D. Survey and water level measurements - 1 week following installation
   E. SAMPLE PIEZOMETERS IF HYDRAULIC GRADIENT IS ESTABLISHED TOWARDS MUNICIPAL WELL # 1, 2, 3 & 5 AS NEGOTIATED


7200

10-29-87
Distributed at
Ekco Meeting

Interim Measures at Ekco Housewares

(1) The Ohio Water Service well field containing wells 1, 2 and 3 located about 3,000 feed northeast of the Ekco facility should be sampled monthly. The samples should be analyzed for low levels (less that 1ppb) of the chlorinated hydrocarbons listed in Table 1, using EPA approved SW 846 method 8010 in conjuction with a purge-and-trap method (Method 5030).

*Drop when #5 in place!!

(2) Planned The pumping rate of the industrial process wells at the Ekco facility should be increased from the current rate of about 350 gal/min to 600 gal/min to help reduce any additional contaminant migration off-site. The excess water generated by the increased pumping rates can be sent to the on-site air stripper for processing. The air stripper is designed to reduce a maximum concentration of 40,000 ppb/l VOC's to 200 ppb/l VOC's in water at a 600 gal/min flow rate. By creating a hydraulic low beneath the Ekco facility, any contaminants present in the groundwater in that vicinity would be induced to flow toward the facility's process wells.

(3) Ohio Water Service MASSILLON well 4 should be reactivated and pumped to waste. By resuming the pumping of OSW well 4 a local hydraulic low would be established in the vicinity of the Ekco plant. The cone of depression created by pumping OSW well 4 to waste would possibly alter the direction of ground-water movement from northeast to east in the plant area, away from the OSW well field containing wells 1, 2, and 3. The change in the ground-water flow direction would help prevent the migration of the contaminants to the well field.

(4) A door-to-door ground-water use survey should be conducted in the vicinity of the Ekco facility as soon as possible. The focus of the survey should be on whether the home or business inventoried has a water well and if so, whether the water is used for drinking, cooking, washing, or industrial purposes.

JOINT TECHNICAL
* MEETING IN COLUMBUS?

*NO BIG DEAL

(5) Ground water monitoring well clusters should be installed between the Ekco facility and OWS wells 1, 2 and 3. The well clusters are to be used to monitor the full thickness of the sand and gravel aquifer. They should be sampled monthly to detect any contaminant migration toward the OWS well field.

If contamination of the ground water is detected in the monitoring (intercept) well clusters, the well should be pumped to waste. This should help decrease the likelihood of contaminants reaching the OWS well field. Also, this would increase contaminant removal from the ground water.